

RCRA Inspection Report

1) Inspector and Author of the Report

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U.S. Environmental Protection Agency, Region 4
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2) Facility Information

National Institute of Environmental Health Sciences (NIEHS or Institute) and
U.S. Environmental Protection Agency Research Triangle Park (US EPA RTP)
111 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709
EPA ID No.: NC2750890004

3) Responsible Officials

Paul Johnson, Environmental Manager, NIEHS
Alan Call, Environmental Compliance Coordinator, US EPA RTP

4) Inspection Participants

Paul Johnson	NIEHS
Alan Call	US EPA RTP
Aram Kim	NCDEQ
Daryl Himes	US EPA, Region 4

5) Date of Inspection

July 21, 2022 9:15 a.m.

6) Applicable Regulations

North Carolina General Statutes (NCGS), 130A BOA-Article 9 (Solid Waste Management Act as amended Resource Conservation and Recovery Act (RCRA) Section 3005 and 3007 (42 U.S.C. §§ 6925 and 6927) and the North Carolina Administrative Code (NCAC) Title 15 A Chapter 13A, [40 Code of Federal Regulation (C.F.R.) Parts 260–270, 273 and 279].

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) to determine the facility's compliance with the applicable regulations.

8) **Facility Description**

The NIEHS and the US EPA RTP are located adjacent to one another on secured property. Both federal facilities are jointly registered as a large quantity generator (LQG) of hazardous waste. Both facilities share a single permitted facility, located in Building 108, for the storage of hazardous waste for a period not to exceed one year. Permit Number NC2 750 890 004 R2 was issued on July 18, 2013, by NCDEQ. It expires on July 18, 2023.

NIEHS is the principal federal agency for basic biomedical research on the health effects of environmental agents. NIEHS South Campus is located on 324 acres of a 509-acre site in Research Triangle Park. Approximately, 1,000 personnel are employed at the institute. NIEHS is connected to Durham County Publicly Owned Treatment Works (POTWs) and Sewer system. The South Campus is comprised of administrative offices and laboratories which are divided into six sections designated as Modules A through F. Only administrative offices are located in Modules A and B.

NIEHS generates a large variety of RCRA listed hazardous waste within the various research laboratories located in Modules C, D, E & F. It is the Institute's policy that all solid and liquid chemical waste material, listed and otherwise, be disposed of according to the NIEHS Hazardous Waste Management Program. Hazardous waste determinations at NIEHS are completed in more detail by the Health and Safety (H&S) staff once the waste is transported to Building 108. All hazardous wastes are manifested off-site from Building 108.

The US EPA RTP facility is located on the remaining 185-acre portion of the 509-acre tract. This facility is divided into five areas designated as Areas A through E. Area C is comprised of administrative offices only. The facility conducts research studies which are divided into three main lab groups described as follows: National Health and Environmental Effects Research Labs (NHEERL), which studies toxicology; the National Exposure Research Labs (NERL), which studies the effects of field media and includes air monitoring; and, the National Risk Management Research Labs (NRMRL), which studies and test combustors (small engines) and conducts air engineering research. The US EPA RTP employs approximately 2500 personnel which operate on 1.1 million square feet of building space.

Hazardous waste is initially taken from the labs in areas A, B, D and E and moved to one of two Chemical Service Centers (CSCs) located in Rooms A-186, A-167, E-178 B, E-178 C and E-178 D which operate as 90-day hazardous waste accumulation areas.

Hazardous wastes may be moved and can be moved to rooms A-186 A, A-167 A and A-182 A which are permitted hazardous waste storage areas before being moved to the permitted Building 108.

Hazardous wastes managed at NIEHS include the following:

- a) Flammable and non-flammable solvents
- b) Toxic liquids and solids
- c) Corrosive liquids and solids
- d) Oil & lubricants
- e) Radioactive liquids and Solids
- f) Mixed-radioactive liquids and solids
- g) Pathological waste
- h) Biological waste
- i) Animal bedding
- j) Trash / solid waste

Hazardous wastes generated by US EPA RTP include the following:

- Flammable liquids and solids
- Toxic liquids and solids (acutely toxic and non-acutely toxic)
- Corrosive liquids and solids
- Oxidizing liquids and solids
- Used Oil
- Mercury
- Very small quantities of reactive solids and liquids
- Radioactive liquids and solids
- Universal wastes
- Bio-hazardous wastes
- Animal carcasses and bedding
- General laboratory trash

9) **Previous Inspection History**

This facility was inspected by the NC DEQ on June 24, 2021. No deficiencies were found.

10) **Findings**

On July 21, 2022, EPA inspector Daryl Himes, accompanied by Aram Kim of the NC DEQ, arrived at NIEHS and the US EPA RTP at approximately 9:15 a.m. Paul Johnson, Hazardous Waste Manager, immediately received the inspectors in the facility lobby and was shown their credentials. The inspectors were taken by Mr. Johnson to an open area of the lobby for an opening conference. The inspectors explained the purpose of their visit and anticipated use of cameras during the inspection and provided a request for records.

Prior to performing the walkthrough inspection, the facility representative provided the inspection team an overview of the facility's history and current operations during the opening conference as described above in the facility overview.

The walkthrough inspection was then performed after providing Mr. Johnson a list of the areas that the inspection team desired to see.

Please note that during the walk-through inspection, containers of hazardous waste were observed within locations designated as satellite accumulation areas (SAAs), central accumulation areas (CAAs) and permitted areas. Unless otherwise noted, each container observed within any SAA was observed to be closed and labeled with the words “Hazardous Waste” and an indication of the hazard of the contents of the container. Containers in any of the CAAs were observed to be closed, marked with an accumulation start date of less than 90-days and labeled with the words “Hazardous Waste” and an indication of the hazard of the contents of the container. Containers in any of the permitted storage areas were observed to be closed, marked with an accumulation start date of less than one-year and labeled with the words “Hazardous Waste” and an indication of the hazard of the contents of the container.

In addition, containers of Universal Waste were observed to be properly labeled, dated, and closed at the time of the inspection, unless noted otherwise.

Also, any containers of used oil observed were labeled with the words “Used Oil” unless noted otherwise.

The observations made during the walk-through inspection were as follows:

The inspectors presented their credentials to Paul Johnson, Hazardous Waste Manager, NIEHS and Alan Call, Environmental Compliance Coordinator, and explained the purpose of the inspection. Facility personnel explained the operations of the NIEHS and US EPA RTP facilities and escorted the inspectors on a walk-through inspection of the facility.

NIEHS Campus

The inspection team notified Paul Johnson that their inspection of the NIEHS labs would include all labs located on the 3rd and 4th floors of the C, D, E and F Buildings. Unless noted within the report, all satellite accumulation area (SAA) containers observed during the inspection of the NIEHS and the US EPA RTP facility were found to be closed, labeled with the words “Hazardous Waste” and marked with an indication of the type of waste being managed within each container. Paul Johnson and Carranza Smith escorted the US EPA and NCDEQ personnel during the inspection of the NIEHS Campus. The observations from this part of the facility are provided immediately below.

C-444 Reproductive Developmental Biology Lab

Separate one-gallon containers of spent xylene and ethanol hazardous wastes were observed in addition to six containers of less than one gallon of hazardous waste lab chemicals in a lab hood within a SAA at the time of the inspection.

C-438 Chromatin and Gene Expression Lab

Three 4-liter containers of hazardous waste laboratory chemicals were observed in a lab hood within a SAA at the time of the inspection.

C-428 Gene Expression Lab

Two one-gallon containers of corrosive hazardous wastes were observed in a lab hood within a SAA at the time of the inspection.

C-424 Histology Lab

No hazardous wastes were observed in this lab at the time of the inspection.

C-416 De Mayo Reproductive Biology Lab

One 4-liter container of hazardous waste ethanol was observed in a lab hood within a SAA at the time of the inspection. The container was not marked with an indication of the hazard characteristics of the contents of the container.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

C-410 and C-406 National Toxicology Lab

One container of less than one gallon of hazardous lab wastes were observed in a lab hood within a SAA at the time of the inspection.

C-452 Self Culture Room

No hazardous wastes were observed in this lab at the time of the inspection.

C-344 Epigenomics Lab

No hazardous wastes were observed in this lab at the time of the inspection.

C-329 Environmental Epigenomics Lab

No hazardous wastes were observed in this lab at the time of the inspection.

C-362 Environmental Epigenomics Lab

No hazardous wastes were observed in this lab at the time of the inspection.

C-360 Environmental Epigenomics Lab

No hazardous wastes were observed in this lab at the time of the inspection.

C-352 Environmental Epigenomics Lab

No hazardous wastes were observed in this lab at the time of the inspection.

D-406 Stem Cell Biology Lab

No hazardous wastes were observed in this lab at the time of the inspection.

D-456 Environmental Epigenomics Lab

No hazardous wastes were observed in this lab at the time of the inspection.

D-440 Epigenetics

No hazardous wastes were observed in this lab at the time of the inspection.

D-417 Epigenetics

Two one-gallon containers of hazardous lab wastes were observed in a lab hood within a SAA at the time of the inspection.

D-330 Mutagenetics and DNA Lab

One 4-liter SAA container of hazardous waste potassium bromate was observed in a lab hood within a SAA at the time of the inspection.

E-338 Molecular Biology

No hazardous wastes were observed in this lab at the time of the inspection.

E-332 Molecular Biology

One 4-liter container of hazardous waste ethyl alcohol and acetone wash was observed in a plastic bin within a SAA at the time of the inspection.

E-308 Molecular Biology

Three 4-liter containers of hazardous waste methanol were observed in a lab hood within a SAA at the time of the inspection.

E-464 Reproductive Biology

Two 4-liter containers of hazardous waste methanol were observed in in a lab hood within a SAA at the time of the inspection. One of the containers was not marked with an indication of the hazards of the contents of the container.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

E-416 Reproductive Medicine

No hazardous wastes were observed in this lab at the time of the inspection.

E-426 Reproductive Medicine

No hazardous wastes were observed in this lab at the time of the inspection.

F-308 Molecular Engineering

Access to this lab could not be gained at the time of the inspection.

F-309 DNA Repair

Access to this lab could not be gained at the time of the inspection.

F-319 Signal Transduction

One 4-liter containers of hazardous waste methanol/acetic acid was observed in a lab hood within a SAA at the time of the inspection. The container was not marked with an indication of the hazards of the contents of the container.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

F-325 Signal Transduction

No hazardous wastes were observed in this lab at the time of the inspection.

F-338 Structural Biology

No hazardous wastes were observed in this lab at the time of the inspection.

F-347 Molecular Endocrinology

No hazardous wastes were observed in this lab at the time of the inspection.

F-354 Molecular Endocrinology

No hazardous wastes were observed in this lab at the time of the inspection.

Building 108 - Waste Handling Facility

The NIEHS and the EPA share Building 108 as a single permitted Waste Handling Facility. The Building 108 Waste Handling Facility is permitted for storage of hazardous waste for a period not to exceed one year. Observations made within Building 108 are provided below with the headings identifying which agency is responsible for the hazardous and universal wastes observed. Personnel for NIEHS (Paul Johnson) and US EPA RTP (Alan Call) were present for the inspection of hazardous wastes within Building 108.

NIEHS Bldg. 108 Room 110 - Corrosive Storage & Waste Recycling

Corrosive materials are stored in Room 110 with acids and bases segregated by distance and by separate secondary spill containment. The inspectors observed one 30-gallon container of hazardous waste corrosive liquids (D002). The inspectors also observed one 5-gallon of hazardous waste acids (D002).

Each the containers were observed to be properly closed, labeled, and dated with an accumulation start date of less than one year.

NIEHS Bldg. 108 Room 111 - Reactive & Oxidizer Storage

The inspectors observed four 5-gallon containers of reactive hazardous wastes in this area. Each of the containers were observed to be closed, labeled with the words “Hazardous Waste” and an indication of the hazards of the contents of the containers and dated. The oldest accumulation start date in this storage area was noted to be March 16, 2022.

NIEHS Bldg. 108 Room 113 - Waste Solvent Processing (Picture-14)

Room 113 is used for consolidation of laboratory solvents and oils into larger containers for off-site disposal or recycling. Waste solvents are typically bulked into a 55-gallon drum and smaller volume waste streams, such as oils, are usually bulked into a 30-gallon container. Two 55-gallon containers of hazardous waste solvents were observed in this area at the time of the inspection. Each the containers were observed to be properly closed, labeled, and dated with an accumulation start date of less than one year.

NIEHS Bldg. 108 Room 114 - Chemical Waste Processing

Room 114 is used for the packaging of NIEHS chemical wastes according to hazard class. Room 114 also contains a walk-in hood capable of holding two containers up to 55-gallons in size for consolidation of liquid wastes. The inspectors observed one 55-gallon container

of hazardous waste flammable liquids in this room at the time of the inspection. The container was observed to be closed and labeled with the words “Hazardous Waste” and a description of the hazard and marked with an accumulation start date of June 24, 2022.

NIEHS Bldg. 108 Room 115 – Radioactive Waste Lab packaging

Room 115 is primarily used for the segregation and packaging of NIEHS radioactive wastes. A walk-in hood capable of holding two containers up to 55 gallons in size is used for consolidation of liquid radioactive and non-radioactive wastes. This hood is also used for consolidation of other RCRA and non-RCRA wastes such as solvents and toxic materials. The inspectors observed one 55-gallon container of corrosive sodium hydroxide hazardous waste. The container was observed to be closed and labeled. The accumulation start date was noted to be March 11, 2022.

NIEHS Bldg. 108, Room 118 - Waste Receiving & Sorting

Room 118 is the receiving area for all wastes and surplus materials brought into the facility. Hazardous wastes and surplus materials coming into this area are separated according to compatibility classes and are held in secondary containment before being moved to the appropriate processing area. Universal wastes and materials pending analysis are also stored in this room.

No hazardous wastes were observed in this area at the time of the inspection.

NIEHS Bldg. 108 Room 120 - Radioactive Waste Decay

Room 120 is the holding area for NIEHS aqueous radioactive wastes that contain short half-life isotopes and NIEHS liquid radioactive-mixed (NRC/RCRA) wastes being held for storage-for-decay under 40 C.F.R. 266 or storage prior to shipment. At the time of inspection, there was no waste stored in this area.

NIEHS Bldg. 108 Room 121 - Packed Waste Storage

Room 121 is the primary storage area for NIEHS wastes which have been packaged for shipment off-site. Containers are placed on a grated floor over depressed, diked containment areas. The inspectors observed six 5-gallon containers; one 15-gallon container; one 25-gallon container, two 30-gallon containers, and five 55-gallon containers of hazardous waste in this area. The containers were observed to be segregated based on DOT class and compatibility. The containers were closed, and each were labeled with the words “Hazardous Waste” and a description of the hazard. In addition, each container was marked with accumulation start dates. The oldest accumulation start date was noted to less than one year. Two 55- and one 30-gallon containers of used oil were also observed in this area. Each container was labeled with the words “Used Oil.”

NIEHS Bldg. 108 - EPA Waste Area Room 124

Alan Call was the primary escort for this area of the permitted facility and the remainder of the inspection of the US EPA RTP’s buildings. The US EPA RTP’s waste is received at

Building 108 in the marshaling area. Hazardous waste determinations have been made for these wastes at one of two 90-day accumulation areas on the EPA part of the facility. Since the hazardous waste determinations have already been made in one of these areas, the waste is ready to be stored on-site once it is received at the TSDF. The waste is removed from the marshaling area and moved to Packed Waste Storage Area in Room 124.

Hazardous wastes were segregated from each other by hazardous class. The wastes observed in Room 124 included six 55-gallon, nine 30-gallon, three 15-gallon, two 5-gallon containers and five 5-gallon boxes.

All of the containers and boxes were closed, labeled with the words “Hazardous Waste,” a description of the hazard contents of the containers and marked with accumulation start dates of less than one year, at the time of the inspection.

Below are the observations made within the labs of Buildings A, B, D and E of the US EPA RTP portion of the facility.

US EPA RTP Building A

Room 186A - Waste Bulking & Storage

This room is included as one of the areas permitted for the storage of hazardous waste under the facility’s permit. Hazardous wastes designated for bulking are received and stored in secondary containment trays on shelves in this area. All bulking activities are performed in a walk-in fume hood equipped with grounding devices and a ventilation alarm system. Completed drums are closed and transported to Building 108, Packed Waste Storage Room 124, for storage prior to off-site disposal. This room also serves as storage for wastes collected from laboratories that are already in 55-gallon drums. Wastes stored in this room include flammable liquids, oils, and corrosive liquids. The maximum quantity of RCRA waste allowed to be stored is 190 gallons. The inspectors observed one 55-gallon container of hazardous waste in this room at the time of inspection. The container was closed, labeled with the words “Hazardous Waste” and a description of the hazard contents of the container and dated with start date of less than one year at the time of the inspection.

Room 186

This room is used as a Central Accumulation Area (CAA) (less than 90-day accumulation area) by the facility for wastes generated in the four US EPA RTP buildings A, B, D and E.

The room includes three bays measuring approximately seven feet by seven feet and three measuring three feet by seven feet. Wastes are segregated into these bays as necessary depending on the quantity and type of hazard class.

No wastes were observed in the larger bays at the time of the inspection.

Three small bottles of hazardous wastes were observed in one of the smaller bays at the time of the inspection. Each were closed, labeled with the words “Hazardous Waste” and a description of the hazard contents of the container and marked with accumulation start dates of less than 90-days at the time of the inspection.

US EPA RTP Building A Room A-167A - Mixed Waste Packing & Storage

This room is permitted to store hazardous waste under the facility’s permit for wastes generated in the four US EPA RTP buildings A, B, D and E.

All EPA mixed wastes being stored for radioactive decay under 40 C.F.R. 266 are stored in this room. Mixed wastes are received, inventoried, and placed into secondary containment on shelves for decay storage.

At the time of inspection, there was one container of cadmium contaminated hazardous waste mice in a refrigerated area of this room. The container was closed, labeled with the words “Hazardous Waste” and a description of the hazard contents of the container and marked with accumulation start dates of less than 90-days at the time of the inspection.

Room A-182A - Radioactive Material Bulking

This room is permitted to store hazardous waste under the facility’s permit for wastes generated in the four US EPA RTP buildings A, B, D and E. All EPA mixed wastes are packaged and stored in this room for offsite shipment. Waste designated for bulking is received and stored in secondary containment trays on shelves prior to consolidation. All bulking activities are performed in a walk-in fume hood equipped with grounding devices and a ventilation alarm system. All drums of liquid waste are stored on secondary containment pallets.

At the time of inspection, there was no waste stored in this area.

Buildings B and D

The inspection team inspected the analytical chemistry labs located on the 5th Floor of Buildings B and D. Below are the observations in each of the lab’s rooms which was operating at the time of the inspection.

Room B-551 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-575 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-553 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-579 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-580 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-555 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-585 A

One-gallon container of hazardous waste isopropyl alcohol was observed in this room at the time of the inspection.

Room B-583 A

No hazardous wastes were observed in this room at the time of the inspection.

Room B-583 B

No hazardous wastes were observed in this room at the time of the inspection.

Room B-588 A

One container of less than 4-liters was observed to contain hazardous waste formalin and para formaldehyde were observed in this room at the time of the inspection.

Room B-561 A

No hazardous wastes were observed in this room at the time of the inspection.

Room D-453 A

No hazardous wastes were observed in this room at the time of the inspection.

Room D-475 A&B

No hazardous wastes were observed in this room at the time of the inspection.

Room D-455 A&B

No hazardous wastes were observed in this room at the time of the inspection.

Room D-477 A

No hazardous wastes were observed in this room at the time of the inspection.

Room D-461 A&B

A 5-gallon container of nitric acid/silver hazardous waste was observed in this room within a SAA at the time of the inspection.

Room D-487 A

A one-gallon container of ethyl acetate hazardous waste was observed in this room within a SAA at the time of the inspection.

Room D-490 A&B

Three containers of hazardous waste acids were observed in this room within a SAA at the time of the inspection.

Room D-466 A

A one-gallon container of spent toluene/methanol and one container of less than one gallon of hazardous waste sodium hydroxide were observed in this room at the time of the inspection.

US EPA RTP Area E, Rooms E-178 (A-D) Less than 90-Day Accumulation Rooms

These rooms are used as a CAA by the facility for wastes generated in the four US EPA RTP buildings A, B, D and E.

US EPA RTP Area E, Room 178A - Chemical Waste Storage (Office Only)

This room serves as an office for the maintenance of training records, weekly inspection records and contingency plan for the Area E 178 Rooms (A-D), no hazardous wastes are accumulated in this room.

US EPA RTP Area E, Room 178C - Chemical Waste Storage (CAA)

This accumulation area contained seven 3-foot by 6-foot bays fitted with metal shelving for the accumulation of various hazardous wastes, as necessary. Hazardous wastes are separated by hazard codes within the individual plastic pans which are placed on the shelves. No specific designations were pre-marked on the shelving for specific waste codes at the time of the inspection.

Various containers of hazardous waste, one gallon or less in volume, were observed in this room on the shelving within one of the bays. Universal waste batteries were also observed in closed containers, labeled with appropriate universal waste labeling, and marked with an accumulation start date of less than one year.

EPA Area E, Room E-178D - Waste Bulking & Storage (Permitted Area)

Waste designated for bulking is received and stored in secondary containment trays on shelves prior to consolidation. All bulking activities are performed in a walk-in fume hood equipped with grounding devices and a ventilation alarm system. Completed drums are closed and transported to Building 108, Packed Waste Storage Room 124, for storage prior to off-site disposal. This room also serves as temporary storage for wastes collected from laboratories that are already in 55-gallon drums. Wastes stored in this room may include flammable liquids, oils, and corrosive liquids. The inspectors observed one 55-gallon container of hazardous waste spent solvents in this area. The container was closed, labeled with the words “Hazardous Waste” and a description of the hazard contents of the container and dated with start date of less than one year at the time of the inspection. One 30-gallon container of used oil, labeled with the words “Used Oil,” was also observed in this area.

Records Review:

A review of the facilities records included the following records:

- Copies of hazardous waste manifests since the date of the last CEI
- Employee training records (NIEHS & US EPA RTP staff)
- Weekly inspection logs for Building 108 and weekly inspection logs for less than 90-day areas (NIEHS & US EPA RTP)
- Contingency Plan (NIEHS & EPA US EPA RTP)

Closing Conference

At the conclusion of the walkthrough inspection and record review, a brief closing conference was conducted with each of the facility participants identified above. During the conference, the areas of concern identified during facility walkthrough were identified and discussed.

11) **Signed**

DARYL HIMES Digitally signed by DARYL HIMES
Date: 2022.09.12 14:31:52 -04'00'

Daryl Himes, Inspector

Date

12) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2022.09.14 14:59:25 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date